

CCRB INVESTIGATIVE RECOMMENDATION

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|--|---|--|---|---|---------------------------------|
| Investigator: Julia Sapienza | Team: Squad #07 | CCRB Case #: 202203719 | <input type="checkbox"/> Force | <input checked="" type="checkbox"/> Discourt. | <input type="checkbox"/> U.S. |
| | | | <input checked="" type="checkbox"/> Abuse | <input type="checkbox"/> O.L. | <input type="checkbox"/> Injury |
| Incident Date(s) Wednesday, 06/08/2022 12:30 PM | Location of Incident: Lott Street and Beverly Road | 18 Mo. SOL 12/8/2023 | Precinct: 70 | | |
| Date/Time CV Reported Wed, 06/08/2022 5:04 PM | CV Reported At: CCRB | How CV Reported: Call Processing System | Date/Time Received at CCRB Wed, 06/08/2022 5:04 PM | | |

| Complainant/Victim | Type | Home Address |
|--------------------|------|--------------|
| | | |

| Subject Officer(s) | Shield | TaxID | Command |
|---------------------------|--------|--------|---------|
| 1. PO Alexander Caballery | 21951 | 962284 | 070 PCT |
| 2. PO Anthony Carolei | 11381 | 961670 | 070 PCT |
| 3. DTS Paul Casale | 06031 | 954610 | 070 PCT |

| Witness Officer(s) | Shield No | Tax No | Cmd Name |
|-----------------------|-----------|--------|----------|
| 1. SGT Steven Owens | 02144 | 933135 | 070 PCT |
| 2. DT3 Eric Gutierrez | 02849 | 954903 | FORCE ID |

| Officer(s) | Allegation | Investigator Recommendation |
|---------------------------|---|-----------------------------|
| A. PO Anthony Carolei | Abuse: Police Officer Anthony Carolei detained § 87(2)(b) | |
| B. PO Alexander Caballery | Abuse: Police Officer Alexander Caballery detained § 87(2)(b) | |
| C. PO Anthony Carolei | Abuse: Police Officer Anthony Carolei searched the vehicle in which § 87(2)(b) was an occupant. | |
| D. PO Alexander Caballery | Abuse: Police Officer Alexander Caballery searched the vehicle in which § 87(2)(b) was an occupant. | |
| E. DTS Paul Casale | Discourtesy: Detective Paul Casale spoke discourteously to § 87(2)(b) | |

Case Summary

On June 8, 2022, § 87(2)(b) made this complaint to the CCRB via the Call-Processing System (Board Review 1).

On June 8, 2022, § 87(2)(b) was driving in Brooklyn when Police Officer Anthony Carolei and Police Officer Alexander Caballero of the 70th Precinct stopped his vehicle at the intersection of Lott Street and Beverly Road. § 87(2)(b) was handcuffed, brought back to the 70th Precinct station house, and lodged in a cell for an hour and a half (Allegations A and B, Abuse of Authority, § 87(2)(g) and released with a summons for reckless driving. While § 87(2)(b) was in the cell, PO Carolei and PO Caballero searched the vehicle § 87(2)(b) was driving when the officers pulled him over (Allegations C and D, Abuse of Authority, § 87(2)(g) § 87(2)(b) alleged that he asked Detective Paul Casale of the 70th Precinct what his name was, and Det. Casale told him to “shut the fuck up,” (Allegation E, Discourtesy, § 87(2)(g)

The CCRB received body-worn camera footage from PO Carolei (Board Review 2&3), PO Caballero (Board Review 4), Det. Casale (Board Review 5), and Sergeant Steven Owens of the 70th Precinct (Board Review 5).

Allegation (A) Abuse of Authority: Police Officer Anthony Carolei detained § 87(2)(b)

Allegation (B) Abuse of Authority: Police Officer Alexander Caballero detained § 87(2)(b)

Allegation (C) Abuse of Authority: Police Officer Anthony Carolei searched the vehicle in which § 87(2)(b) was an occupant.

Allegation (D) Abuse of Authority: Police Officer Alexander Caballero searched the vehicle in which § 87(2)(b) was an occupant.

In his statement to the CCRB (Board Review 6) § 87(2)(b) said that on June 8, 2022, he was driving from his home at § 87(2)(b) to go pick up his child. § 87(2)(b) was driving his child’s grandmother’s 2011 Jeep Patriot. § 87(2)(b) turned right onto Clarendon Road, and then left onto Bedford Avenue. § 87(2)(b) was just past a tire shop on Bedford Avenue when he noticed an unmarked police vehicle behind him with lights and sirens on. There was a car in front of § 87(2)(b) and the police car was very close behind his car, so § 87(2)(b) continued driving until he reached a red light at the intersection of Bedford Avenue and Cortelyou Road because he felt that he could not pull over. § 87(2)(b) made a right turn when the light changed so he could pull over. The block was so small that the officers, either using the lights or by talking over the bullhorn, told § 87(2)(b) to keep going. § 87(2)(b) made a left on to Lott Street, which is also a small and narrow street. The officers kept driving behind § 87(2)(b) pushing him to the corner of Lott Street and Beverly Road. § 87(2)(b) pulled over at an angle. A map has been made of § 87(2)(b) stated route, including locations of stop signs and stop lights (Board Review 13). While driving, § 87(2)(b) felt that the officers’ car was too close to his car and that he had no choice but to keep driving. § 87(2)(b) said that he was driving perfectly and did not know why he was pulled over. § 87(2)(b) had his license and registration ready when PO Carolei approached the driver’s side and PO Caballero approached the passenger side. PO Carolei handed § 87(2)(b) license to PO Caballero, who went to the back of § 87(2)(b) vehicle to run it. A few minutes later, a silver Chevy Impala arrived in scene and Det. Casale and Sgt. Owens exited. Det. Casale nodded at PO Carolei and then PO Carolei arrested § 87(2)(b) § 87(2)(b) asked why he was being arrested and the officers told him that they’ll let him know when they get back to the station. § 87(2)(b) was brought to the 70th Precinct station house, where they brought him to the front desk, searched his pockets, and vouchered his belongings. This made § 87(2)(b) believe he was under arrest. The officers put § 87(2)(b) in a cell, where he waited for four to five hours. The officers came in and told him he was being released with a summons, and § 87(2)(b) was confused because they already impounded and

searched his vehicle. § 87(2)(b) asked the officers who gave consent for the search of his vehicle if he was not under arrest. § 87(2)(b) did not see anybody search the car, but he thought it was searched because the car seat was turned around and the cushions were taken out. § 87(2)(b) was released and let go with an allegedly “fake” summons. § 87(2)(b) provided a picture of the summons (**Board Review 12**), and the summons can also be found in PO Carolei’s memo book (**Board Review 11**). § 87(2)(b) name is misspelled on the ticket as § 87(2)(b). The summons cites that § 87(2)(b) violated VTL 1212 and its factual allegation section is filled out by PO Carolei as such, “The undersigned did observe the deft operating a motor vehicle in such a manner in which the deft did create a serious risk of physical injury or death by disobey pavement marking, failure to signal.” Per § 87(2)(b) Notice of Claim (**Board Review 23**) filed regarding this incident, § 87(2)(b) appeared twice in court to answer the summons, but PO Carolei and PO Caballery never appeared, and the summons was dismissed. The NYC Criminal Court system has since said that the summons is sealed (**Board Review 27**).

In PO Carolei’s CCRB testimony (**Board Review 7**), he said that he saw § 87(2)(b) vehicle driving eastbound on Cortelyou Road, and witnessed it roll past a stop sign without stopping, causing a pedestrian to not be able to use the crosswalk, and then the car failed to stop at another stop sign after this. PO Carolei said that these moving violations, conducted one after the other in a row, amounted to reckless driving, according to his training. PO Carolei was driving the unmarked police vehicle and PO Caballery was in the passenger seat. In his statement to the CCRB (**Board Review 8**) PO Caballery said that they had been driving eastbound on Cortelyou Road when both he and PO Carolei noticed § 87(2)(b) car run a four-way stop sign at Cortelyou Road and either East 22nd or East 23rd Street. PO Caballery did not notice if there were any pedestrians around. Once PO Caballery noticed the car run the stop sign, he immediately took down the license plate number and searched it on his job phone. Because of this, PO Caballery said that he did not witness any other moving violations because he was focused on looking at his phone. PO Carolei said to PO Caballery, “this guy is driving recklessly,” so PO Caballery told PO Carolei to pull the car over. They pulled over § 87(2)(b) at the corner of Beverly Road and Lott Street. Both PO Carolei’s (**Board Review 2**) and PO Caballery’s (**Board Review 4**) body-worn camera footages are consistent with their testimonies in that it shows PO Carolei driving a police vehicle and PO Caballery in the passenger seat. Both videos begin when the vehicle is waiting at a red light on Cortelyou Road between East 23rd Street and Bedford Avenue. A map has been made to show where the officers drove (**Board Review 14**). Neither PO Carolei’s nor PO Caballery’s body-worn camera footage shows PO Caballery searching for § 87(2)(b) license plate on his job phone. It is unclear from the footage if, at its start, they are already in the process of pulling over § 87(2)(b). At 00:38 mark in PO Carolei’s footage (**Board Review 2**), he can be seen pressing the horn to activate the sirens on the car. § 87(2)(b) vehicle cannot be seen in either PO Carolei’s or PO Caballery’s footage until they reach the intersection of Lott Street and Beverly Road. § 87(2)(b) is pulled over at this intersection at the 00:57 mark in PO Carolei’s body-worn camera footage (**Board Review 2**) at embedded timestamp 13:33:43.

The routes described by the officers (**Board Review 14**) and § 87(2)(b) (**Board Review 13**) are inconsistent. According to § 87(2)(b) statement, he did not pass any stop signs during his drive until after he is pulled over at Beverly Road and Lott Street. From where the officers’ body-worn camera footage begins, it does not appear that they are in pursuit of § 87(2)(b) at that point, and they also do not pass any stop signs until they reach the corner of Beverly Road and Lott Street. Because of the differences in the routes described by the officers and § 87(2)(b) along with the lack of video evidence of the moving violations, it is unclear if § 87(2)(b) was driving in a manner that amounted to reckless driving, and it is unclear if he committed any traffic violations at all.

Furthermore, the CCRB received the searches that were conducted for § 87(2)(b) license plate (**Board Review 9**). PO Caballery searched for § 87(2)(b) license plate number § 87(2)(b) on June 8, 2022, at 13:36:45 from a mobile search. This is consistent with his body-worn camera footage (**Board Review 4**), which shows that he was handed § 87(2)(b) license and registration at the 01:41 mark, when the embedded timestamp is 13:34:30. PO Caballery conducted no searches for § 87(2)(b) license plate number prior to this, according to the warrant audit check and his own body-worn camera footage. This goes against the statement that PO Caballery provided in his interview (**Board Review 8**) that he did not witness any further moving violations because he was searching § 87(2)(b) license on his job phone.

PO Carolei's body-worn camera footage (**Board Review 2**) shows the officers pulling over § 87(2)(b) at the 00:58 mark, with embedded timestamp 13:33:44. PO Carolei approaches the driver's side of the vehicle and § 87(2)(b) has his license and registration ready, holding it outside of his window. PO Carolei asks, "hey, how you doing? How's everything?" and § 87(2)(b) smiles and says that everything is alright. At the 01:24 mark, § 87(2)(b) asks what the problem is. PO Carolei says that § 87(2)(b) was disobeying markings and didn't come to a full stop. § 87(2)(b) apologizes and says he hopes it's no biggie and says he was on his way to pick up the baby. PO Carolei says to § 87(2)(b) "what you did was pretty reckless, man. You know you have to come to a complete stop when you're going through the intersection, okay?" § 87(2)(b) says, "I gotcha" and shrugs. PO Carolei asks if everything is alright with the car and § 87(2)(b) says that everything is cool. In his CCRB interview (**Board Review 7**) PO Carolei said that he chose to bring § 87(2)(b) back to the station house because he was suspicious of him. § 87(2)(b) was nervous and his statements did not make sense, so PO Carolei thought there might have been more criminality afoot. § 87(2)(b) was not reactive to PO Carolei's questioning and he felt that there was something off. PO Carolei has made many stops and said that when people act a certain way there tends to be criminality afoot. § 87(2)(b) was failing to answer questions directly and PO Carolei felt that he was dancing around his answers. PO Carolei had questioned § 87(2)(b) about where he was going, and § 87(2)(b) paused for a little bit and then said he was going to pick up his kids. PO Carolei felt that § 87(2)(b) was thinking of an answer to give him, which raised his suspicions. PO Carolei and PO Caballery decided to call another unit to the scene so they could bring § 87(2)(b) to the stationhouse and conduct further investigation. PO Carolei's statement is inconsistent with his body-worn camera footage, which shows § 87(2)(b) being very cooperative and friendly.

The 05:06 mark in PO Carolei's body-worn camera footage (**Board Review 2**), embedded timestamp 13:37:52, shows that Det. Casale and Sgt. Owens arrive in their silver unmarked police vehicle. None of the officers speak to one another and PO Carolei asks § 87(2)(b) to step out of the car. PO Carolei pats down § 87(2)(b) and handcuffs him. § 87(2)(b) asks what happened and if there's anything wrong with his license, and PO Carolei says that he'll tell him when they get back to the stationhouse. § 87(2)(b) goes to sit in the back of PO Carolei's police vehicle, with PO Carolei sitting in the back seat with him and PO Caballery driving.

In PO Caballery's CCRB statement (**Board Review 8**) he said that when he and his partner are in the field, they do not go into details, and they just tell their supervisor if they're bringing someone back or not. In this case, the officers told Sgt. Owens that they were bringing § 87(2)(b) back to the station house. It was a collective decision to bring § 87(2)(b) back to the station for reckless driving. Driving recklessly occurs for a reason, so they were thinking ahead of the game, because § 87(2)(b) possibly could have come from committing a crime. They brought § 87(2)(b) back to further investigate what might have been going on. PO Caballery said that officers are allowed to issue a summons at the scene of the infraction, but reckless driving is an arrestable offense. PO Caballery also said that generally, their team always brings people back to the station

house for reckless driving. The car § 87(2)(b) was driving was brought to the station house by Det. Casale.

In PO Carolei's body-worn camera footage (**Board Review 2**) the police car arrives at the 70th Precinct station house at the 14:50 mark, at embedded timestamp 13:47:36. The footage shows § 87(2)(b) being lodged at the desk in the stationhouse, where at the 16:30 mark PO Carolei tells § 87(2)(b) that he is going to receive a ticket and they brought him back to the stationhouse because they did not have any tickets on them. In his CCRB interview (**Board Review 7**) PO Carolei said that he had summonses on him at the time, as he always carries them on him. If PO Carolei did not have summonses on him, he would have to immediately get more. When shown this footage, PO Carolei said he did not recall saying that, could not hear it on the footage, but that he could have said that to calm § 87(2)(b) down.

In his CCRB interview (**Board Review 8**) PO Caballero said that he was not familiar with § 87(2)(b) when they pulled him over, but that when they got back to the stationhouse, he realized that he recognized § 87(2)(b) from posters that were up around the station house. PO Caballero could not recall what the posters were for. The CCRB received a copy of this poster (**Board Review 26**). It is titled "Intelligence Alert for Firearm Possession: Field Information Needed – Person." It includes a picture of § 87(2)(b) his full name, date of birth, his NYSID, and his last known address at § 87(2)(b) in Brooklyn. It reads, "On June 1, 2022, at approximately 1300 hours, the undersigned received information that the above listed individual may be in possession of a semi-automatic firearm. Furthermore, the subject engages in narcotic sales in the vicinity of 1024 Flatbush Avenue in front of 'Vybe Hotel' in the confines of the 70th Precinct from approximately 0500 – 0800 hours. The subject is known to operate a gray Jeep Patriot, NY Plate § 87(2)(b). This individual is not wanted at this time. Utilize proper tactics when approaching. Anyone with information regarding the above subject, please notify Officer Eric Gutierrez," at a listed phone number.

The CCRB also received the searches that were conducted for § 87(2)(b) by his name and date of birth (**Board Review 16**) and his driver's license number, information which is not included on the poster (**Board Review 10**). § 87(2)(b) driver's license number was searched three times on June 8, 2022: once by PO Carolei at 13:02:08 from a mobile search, notably before § 87(2)(b) was pulled over at 13:33:45, and twice by Detective Eric Gutierrez at 14:24:26 and 14:24:52, after § 87(2)(b) had been brought back to the 70th Precinct stationhouse. PO Carolei searched for § 87(2)(b) by name and date of birth (**Board Review 16**) six times on June 8, 2022: at 08:56:17, 09:09:34, 09:11:57, 13:02:06, all before § 87(2)(b) was pulled over, and at 14:10:22, 14:10:56, after § 87(2)(b) was at the stationhouse. The CCRB received a prisoner holding pen roster (**Board Review 17**) that showed that § 87(2)(b) was lodged from 13:40 until 15:10, amounting to being in the cell for an hour and a half.

In his statement to the CCRB (**Board Review 7**) PO Carolei said that the further investigation he conducted at the stationhouse consisted of searching § 87(2)(b) vehicle for contraband and checking § 87(2)(b) license and driving record more thoroughly. PO Carolei and PO Caballero were considering issuing a desk appearance ticket for § 87(2)(b). If they had given § 87(2)(b) a desk appearance ticket, they would have to inventory the car. The officers searched the driver's seat of § 87(2)(b) car, and after finding nothing, they decided they did not need to do an inventory search. The purpose of searching the driver's seat was to check for contraband, because PO Carolei thought there was further criminality afoot. After this investigation, PO Carolei and his partner decided that § 87(2)(b) did not need to receive a desk appearance ticket and decided to issue § 87(2)(b) a summons and a warning. The officers released the vehicle to § 87(2)(b) after issuing the summons. PO Caballero's CCRB statement (**Board Review 8**) is inconsistent with PO Carolei's, and he says that once back at the stationhouse, § 87(2)(b) was considered under arrest. PO Caballero

did an inventory search of the vehicle, in order to see if there was anything valuable in the car that would have needed to be vouchered for safekeeping. Nothing of value was found. If PO Caballery had found anything, he would have made note of it, but not vouchered it, because § 87(2)(b) was being released with a summons and it would have taken him a long time to get his things back. PO Caballery said it is normal protocol to start doing inventory searches for anyone who is considered under arrest, even if the officers do not know if the person is being released, because inventory searches are long and tedious, and it is better for it to get started early. PO Caballery said that at some point, a decision was made to release § 87(2)(b) with a criminal summons for reckless driving, but that decision was made by either PO Carolei or Sgt. Owens, and PO Caballery had no say in it.

Vehicle & Traffic Law Section 1212 (**Board Review 15**) defines reckless driving to “mean driving or using any motor vehicle, motorcycle or any other vehicle propelled by any power other than muscular power or any appliance or accessory thereof in a manner which unreasonably interferes with the free and proper use of the public highway, or unreasonably endangers users of the public highway. Reckless driving is prohibited. Every person violating this provision shall be guilty of a misdemeanor.”

People v. Howell 49 N.Y.2d 778 (**Board Review 24**) states that the officers in that case, “based on no more than what the police considered to be erratic driving on the part of the defendant, they approached the defendant with guns drawn and proceeded to “frisk” the defendant. The trial court was in error in its conclusion that merely because reckless driving is a misdemeanor rather than a traffic violation, the arrest was inevitable. An arrest in a situation such as was presented in this case was neither called for nor the preferred procedure. In the case of *Howell*, (as in the case of § 87(2)(b) here) the defendant was never informed that he was under arrest for reckless driving and he was never charged with that offense (unlike § 87(2)(b) who received a summons for reckless driving). Citing *People v. Marsh*, 20 N.Y.2d 98; *People v. Adams*, 32 N.Y.2d 451, 455, the court noted “There is, perhaps, an area of traffic violation ‘arrest’ where a full-blown search [of the arrestee] is not justified, but it might seem to be confined to a situation where an arrest was not necessary because an alternative summons was available or because the arrest was a suspect pretext.”

Patrol Guide 218-13 outlines protocol on Inventory Searches (**Board Review 18**). It says that the purpose of conducting an inventory search is “to protect property, ensure against unwarranted claims of theft, and protect uniformed members of the service and others against dangerous instrumentalities.”

People v. Johnson 1 N.Y.3d 252 (**Board Review 25**) says that “An inventory search is exactly what its name suggests, a search designed to properly catalogue the contents of the item searched. The specific objectives of an inventory search, particularly in the context of a vehicle, are to protect the property of the defendant, to protect the police against any claim of lost property, and to protect police personnel and others from any dangerous instruments ... As the Supreme Court has stated, “an inventory search must not be a ruse for a general rummaging in order to discover incriminating evidence”. To guard against this danger, an inventory search should be conducted pursuant to “an established procedure clearly limiting the conduct of individual officers that assures that the searches are carried out consistently and reasonably” (*People v. Galak*, [1993]). The procedure must be standardized so as to “limit the discretion of the officer in the field”. While incriminating evidence may be a consequence of an inventory search, it should not be its purpose.”

As noted above, based on the body-worn camera footage, there is no clear evidence that § 87(2)(b) was driving recklessly. Based on the path § 87(2)(b) said he was driving it is unlikely that he passed through two stops signs and that PO Carolei and PO Caballery were in a position to

witness this. Additionally, the summons issued to § 87(2)(b) misspelled his name, and was ultimately dismissed after the officers twice failed to appear in court.

What is clear is that on June 1, 2022, approximately a week before this incident, officers at the 70 Precinct learned that § 87(2)(b) might be in possession of a semi-automatic firearm and that an Intelligence Alert for Firearm Possession was issued with his address, license plate, and a vehicle description. The alert noted that § 87(2)(b) was “not wanted at this time.” Additionally, while PO Caballery claimed to have no knowledge of § 87(2)(b) before they approached his vehicle, the warrant audit log shows that on the date of the incident, PO Carolei searched for § 87(2)(b) by name and date of birth six times before they initiated the car stop (including three times around 9:00 a.m., four hours before the car stop). Furthermore, PO Carolei cited § 87(2)(b) acting suspiciously as the reason for bringing § 87(2)(b) back to the stationhouse. To the contrary, the body-worn camera footage shows that § 87(2)(b) was cooperative with the officers and did not act suspicious in any way. PO Carolei said that he brought § 87(2)(b) vehicle back to the stationhouse specifically to search it for contraband because he believed further criminality was afoot, but he did not cite any specific reasons that lead him to this conclusion, aside from § 87(2)(b) allegedly suspicious behavior, which is not seen in the BWC. § 87(2)(g)

§ 87(2)(g) Additionally, the summons misspelled § 87(2)(b) name, and the officers did not appear in court for the summons.

§ 87(2)(g)

Allegation (E) Discourtesy: Detective Paul Casale spoke discourteously to § 87(2)(b)

In his statement to the CCRB (**Board Review 6**), § 87(2)(b) alleged that while he was leaving the 70th Precinct station house, he asked Det. Casale, “who are you? What’s your name? Why did you do this to me?” and Det. Casale responded, “shut the fuck up.”

PO Carolei’s body-worn camera footage (**Board Review 3**) shows PO Carolei releasing § 87(2)(b) from the 70th Precinct station house. At the 01:21 mark, § 87(2)(b) shouts across the station house, “what’s your name big dog?” Det. Casale replies, “Casale.”

PO Carolei’s body-worn camera footage captures the time during which § 87(2)(b) was leaving the station house. It is undisputed that § 87(2)(b) asked Det. Casale who he was, but the footage clearly shows Det. Casale responding with his name, and not telling § 87(2)(b) to “shut the fuck up.” § 87(2)(g)

Civilian and Officer CCRB Histories

- § 87(2)(b)
§ 87(2)(b)
§ 87(2)(b)
- Police Officer Alexander Caballery has been a member of service for 6 years and has been a subject in 5 CCRB complaints and 14 allegations, of which one was substantiated. (**Board Review 20**):
 - Case 202106566 involved a substantiated allegation of failure to provide RTKA card against PO Caballery. The Board recommended Formalized Training and the NYPD has not yet imposed discipline.

- Police Officer Anthony Carolei has been a member of service for 6 years and has been a subject in 8 CCRB complaints and 27 allegations, of which 6 were substantiated. **(Board Review 21):**
 - Case 202005916 involved substantiated allegations of chokehold, pepper spray, physical force, refuse to obtain medical treatment, and false official statement against PO Carolei. The Board recommended charges and the NYPD has not yet imposed discipline.
 - Case 202106566 involved substantiated allegations of failure to provide RTKA card against PO Carolei. The Board recommended formalized training and the NYPD has not yet imposed discipline.

- This complaint was not suitable for mediation.
- § 87(2)(b) filed a Notice of Claim with the City of New York claiming unlawful search and seizure, false arrest, false imprisonment, assault, battery, malicious prosecution, unlawful strip search, violations of the federal and state constitutions, and vicarious liability, and is seeking \$1,000,000.00 as redress (**Board Review 23**). [§ 87(2)(b)] [§§ 86(1)(3)&(4)] [§ 87(2)(g)]

Squad: 7